

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

COMMISSIONERS OF PUBLIC WORKS) C/A No. 2:21-cv-00042-RMG
OF THE CITY OF CHARLESTON (d.b.a.)
Charleston Water System), Individually and)
on Behalf of All Others Similarly Situated,)
)
Plaintiff,) **JOINT MOTION TO DISMISS PURSUANT**
) **TO RULE 12(b)(1) FOR LACK OF**
Versus) **STANDING, AND, IN THE**
) **ALTERNATIVE, TO DISMISS PURSUANT**
COSTCO WHOLESALE CORPORATION,) **TO RULE 12(b)(6) FOR FAILURE TO**
CVS HEALTH CORPORATION,) **STATE A CLAIM**
KIMBERLY-CLARK CORPORATION,)
THE PROCTER & GAMBLE COMPANY,)
TARGET CORPORATION,)
WALGREENS BOOTS ALLIANCE, INC.)
and WAL-MART, INC.,)
)
Defendants.)

The Defendants Costco Wholesale Corporation, CVS Health Corporation, The Procter & Gamble Company, Target Corporation, Walgreens Boots Alliance, Inc. and Wal-Mart, Inc. move the Court for an Order dismissing Plaintiff's Complaint Pursuant to Rule 12(b)(1) for Lack of Standing, and, in the Alternative, to Dismiss Pursuant to Rule 12(b)(6) for Failure to State a Claim. The grounds for this Motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

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